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19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO-OAKLAND DIVISION

22 WILEY GILL; JAMES PRIGOFF; TARIQ
23 RAZAK; KHALED IBRAHIM; and AARON
24 CONKLIN,

25 Plaintiffs,

26 v.

27 DEPARTMENT OF JUSTICE; ERIC H.
28 HOLDER, Jr., in his official capacity as the
Attorney General of the United States;
PROGRAM MANAGER - INFORMATION
SHARING ENVIRONMENT; KSHEMENDRA
PAUL, in his official capacity as the Program
Manager of the Information Sharing
Environment,

Defendants.

No. 3:14-CV-03120-RS

**PLAINTIFFS' ADMINISTRATIVE
MOTION AND [PROPOSED] ORDER
REGARDING PAGE LIMITS**

1 Pursuant to Civil Local Rule 7-11 and 7-12, Plaintiffs respectfully request an enlargement
2 of the page limit from 25 pages to 35 pages for their opposition to Defendants' Motion to
3 Dismiss. In support of this administrative motion, Plaintiffs state as follows:

- 4 1. Defendants have filed a Motion to Dismiss. *See* ECF No. 21.
- 5 2. The parties previously stipulated to an enlargement of the page limits from 25 pages
6 to 35 pages for Defendants' Motion to Dismiss. *See* ECF No. 19. The Court entered
7 an order approving the stipulation. *See* ECF No. 20.
- 8 3. Providing Plaintiffs 35 pages to respond to Defendants' Motion to Dismiss would
9 ensure the parties have commensurate briefing space to address the issues raised on
10 Defendants' motion.
- 11 4. Defendants have stipulated to the enlargement of the page limits sought herein.

12 Respectfully submitted,

13 DATED: November 13, 2014

14 By: _____ /s/ Linda Lye

15 Linda Lye

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27 *Attorneys for Plaintiffs*

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STIPULATION

Pursuant to Civil Local Rules 7-11 and 7-12, Plaintiffs respectfully request an enlargement of the page limit from 25 pages to 35 pages for their opposition to Defendants' Motion to Dismiss.

Defendants do not oppose that request for an enlargement of the page limit.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: November 13, 2014

By: _____ /s/ Linda Lye

Linda Lye¹

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN CALIFORNIA

Attorneys for Plaintiffs

DATED: November 13, 2014

By: _____ */s/ Kieran G. Gostin*

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Attorneys for Defendants

¹ I, Linda Lye, hereby attest, in accordance with Local Rule 5-1(i)(3), the concurrence in the filing of this document has been obtained from the other signatory listed here.

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3 **[PROPOSED] ORDER**

4 Pursuant to the stipulation by the parties, and good cause having been shown, it is hereby
5 ordered that notwithstanding Civil Local Rule 7-3, Plaintiffs may file an opposition brief not to
6 exceed 35 pages.

7 IT IS SO ORDERED.

8 Dated: 11/14/14



9 Hon. Richard Seeborg
10 United States District Judge

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**DECLARATION OF LINDA LYÉ IN SUPPORT OF ADMINISTRATIVE MOTION
REGARDING PAGE LIMITS**

I, Linda Lye, declare as follows:

1. I am counsel for Plaintiffs in the above-captioned matter. I am a member of good standing of the State Bar of California and the bar of this Court. I make this declaration in support of this Stipulation Regarding Page Limits, filed concurrently herewith. The matters stated in this declaration are based on my personal knowledge and if called upon to do so, I could and would competently testify thereto.
2. On October 14, 2014, the parties stipulated to Defendants' request to enlarge the page limits for its Motion to Dismiss from 25 pages to 35 pages. *See* ECF No. 19.
3. On October 16, 2014, the Court entered an order approving the stipulation. *See* ECF. No. 20.
4. On October 12, 2014, my office contacted counsel for Defendants and inquired whether Defendants would stipulate to an enlargement of the page limits for Plaintiffs' opposition brief from 25 pages to 35 pages.
5. On October 13, 2014, counsel for Defendants responded that Defendants would so stipulate.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of November 2014.

/s/ Linda Lye

Linda Lye